Introduction

This manual is intended for use as an aid for training a new food safety specialist and as a reference for an established food safety specialist.

Instructions relative to form preparation, sampling procedures, use of various pieces of equipment, etc. are included.

Program policy and procedure guidelines for disasters, working hours, scheduling, etc. are also included.

Finally, a reference section on the life history and habits of common food-related pests is provided.

This manual is prepared with the idea that it can be used in addition to the knowledge, training, and experience of the food safety specialist. Our job encompasses a large amount of knowledge which is not necessarily used in its entirety every day. It is realized that over a period of time a food safety specialist will need to refresh his/her memory on policy procedures. With this manual handy for reference, the food safety specialist can refresh his/her memory and complete the task.

The value of a food safety specialist is measured both by his/her productivity and the quality of his/her work. This manual should be an aid in achieving both of those goals.

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Duties of the Food Safety Specialist

The duties of a food safety specialist are varied and many fold. First, she/he should inspect all establishments where human foods are manufactured, packed, stored, or distributed to determine if these establishments are complying with the applicable laws and regulations. The food safety specialist should examine closely the raw stock and/or ingredients in food processing plants to determine if they are contaminated with insect filth, rodent filth, poisonous substances, dust, or any other foreign contamination. She/he should determine whether the floors, walls, ceilings, and equipment in the plant are being maintained in a sanitary condition; whether all the equipment in the plant is being thoroughly cleaned daily; and whether the equipment is free of insects or other foreign substances which may contaminate food products. The food safety specialist should examine the types of insecticide and rodenticide being used and determine how they are being applied.

In all food establishments the food safety specialist should observe closely the habits of all employees. She/he should check to see if they are wearing clean clothing; if their hands are clean; if they are free of visible disease and skin sores and if they are handling food products and processing equipment in a proper manner.

In instances where violations are encountered it is the responsibility of the food safety specialist to thoroughly document these findings, paying particular attention to

cause and affect relationships. Product samples, ingredient samples, exhibit samples, photographs, etc. are all a part of the documentation process and the food safety specialist must be able to employ them properly. Disaster work is an important part of a food safety specialist's duties. Although infrequent, the potential for danger to the public posed by contaminated food resulting from floods, fires, truck wrecks, etc. warrants immediate action by a food safety specialist. Therefore, all food safety specialists are on call at all hours to respond to such incidents. Each food safety specialist is expected to possess the skills and confidence necessary to function effectively under what is sometimes very trying conditions.

Consumer complaint investigation accounts for a significant amount of food safety specialist time. Because of the public contact aspect of complaints and because complaints sometimes reveal problems we otherwise would not have discovered, a food safety specialist must possess good investigative skills and tact.

Field personnel is the first line of public contact for the Department. Therefore, you should always perform your duties and conduct yourself in a manner which reflects favorably upon the Department. Appearance is an important part of a public image. A food safety specialist will be neat, clean and well groomed. Clean slacks, shirts and ties are appropriate for men and clean slacks and a dress top for women. You are part of a professional organization and

should project a professional image.

Effective written and oral communications are essential in your day to day responsibilities. The ability to state ideas and observations clearly and concisely, the ability to define and develop cause and effect relationships, the ability to interpret and explain laws and regulations, and the abilities to build inspectional findings into a complete case are all communicative skills which a food safety specialist must possess.

The sum total of all of these responsibilities is, of course, a food safety specialist who is a credit to himself/herself and the Department and who can take deserved pride for a job well accomplished.

Inspection Report *

The food safety specialist should do the following things before preparing the Inspection Report:

1. Obtain accurate name and title of the person to whom the Inspection Report is addressed, the correct name and address of the firm, and the phone number.
1. Review notes of the objectionable conditions recorded during the inspection.
2. If the firm has been previously inspected, refer to prior inspections and compare objectionable conditions.
3. Decide which objectionable conditions are the most serious and list them in descending order according to seriousness.

It is very important that inspection reports be factual, neat, accurate, descriptive and precise. Good wording and sentence structure should be used. A good quality report assists the office in evaluating the inspection results and also makes a favorable impression on management. When writing objectionable conditions state the exact nature and location of the condition. In some instances, it is a good idea to indicate the distance between a condition and susceptible food products, particularly when dealing with rodents and insects. For example:

> One dead rat and 40 rat droppings were observed on the floor in the southwest corner of the stockroom, three feet from a pallet of bagged cornmeal.

This observation indicates a more direct correlation between the condition and possible contamination of food products, and could be of great assistance in obtaining a conviction when involved in court action. When documenting an

inspection **be sure,** only **objectionable conditions are listed on the inspection report**. Review the inspection report for errors before presenting it to management.

The original inspection report should be presented to the owner, manager or employee in charge in this order. The owner, manager or employee should sign as having received the inspection report. If food products are to be destroyed, this person must also initial stating that the adulterated food products listed will be destroyed. **(The voluntary destruction section should always be signed before product is destroyed)** One copy with the data entry section should be sent to the regional office. The food safety specialist should keep one copy of the inspection in the their territory file. On request, extra copies of the inspection report may be needed, such as those copies for chain stores.

The Inspection Report is used to write memos* for visits to firms. This includes visits for sample collecting, attempted inspections or out of business, no objectionable conditions inspections and any other visits to a firm.

Preparation of Inspection Report

Prepare the Inspection report in the following manner:

Tel No.: The correct phone number including area code

CFN: The Central File Number that has been assigned to the firm. If the firm is a new firm the location code and the CFN prefix should be list.

TO: The full name and title of the most responsible person

of the establishment.

Date: The date that the Inspection Report is issued.

Firm Name and Address: The full name of the business, corporation and/or trading name. The full location address and if mailing address is different the mailing address.

During an inspection of: The type of business or inspection done (grocery, deli department, etc.).

On: The date the inspection was done.

CL: The classification (NAI, VAI, or OAI) **THIS SECTION IS NOT FILLED IN ON THE FIRM'S COPY.**

REG. FU: The regulatory follow-up (letter of warning, field hearing, administrative hearing) **THIS SECTION IS NOT FILLED IN ON THE FIRM'S COPY.**

NEXT IN: The next inspection date. **THIS SECTION IS NOT FILLED IN ON THE FIRM'S COPY.**

By: The inspector's or supervisor's initials. **THIS SECTION IS NOT FILLED IN ON THE FIRM'S COPY.**

Inspection Report left with: Type the name and title of

the person signing the report. This person should sign above their name.

By: Food Safety Specialist name should be typed in this space with their FDA # in the Inspector # space.

Adulterated food items listed in were destroyed with my consent: The person that signed in the section above should initial the first blank section when products are destroyed. The # of the observation indicating the adulterated food should be listed in the second blank section.

Witnessed the collecting, marking, or sealing of : The person that signed in the above section should initial the first blank section when samples are collected. The sample numbers should be listed in the second blank section.

Portion of Sample was left with firm: Mark this box if when collecting a sample a portion was left with the firm.

Vendor did not desire portion of sample: Mark this box if when collecting a sample the firm did not want a portion.

Picture: Mark this box if pictures were taken during the inspection.

Price Paid: Indicate the amount paid for a sample. You will need to get a receipt to get reimbursed on your expense voucher.

Received by: This only needs to be filled out if there is a second page. The person receiving the report will initial in this section.

Data Entry Section: The section at the very end of the Inspection Report is the data entry section. This should be completely filled out with each report. When objectionable conditions are listed the boxes for the corresponding abbreviated* conditions should be marked (X).

Name Change: If there is a name indicate it here but also indicate it somehow on the front page so that the clerical staff will be able to find the file.

Address Change: If there is an address change indicate it here and a helpful hint would be to somehow indicate it near the CFN.

New firm: Indicate here if the firm is new.

Food Service: If the firm has a food service operation indicate it here.

HD Inspects (Health Department): If the firm is also inspected by the Health Department indicate it here.

INSPECTION TYPE: Indicate the type of inspection that was done, State, Contract, or Agreement.

BASIS OF INSPECTION: The reason for the inspection, routine, compliance or complaint should be indicated here.

Products: Any products listed in the inspection report that were corrected or destroyed should be listed.

FDA #: The FDA for the products that were corrected or destroyed.

Action Taken: What action was taken with these products.
LBS: The number pounds of the product in whole numbers.

P#: In the case of eggs the Plant number is needed.

Lot code: The lot code of the eggs (no other codes are needed here).

Problem with Product: What was the problem was found with the eggs.

* See FOM procedures 029

TEL NO.

CL

COMMONWEALTH OF VIRGINIA

Department of Agriculture and Consumer Services

OFFICE OF FOOD SAFETY

P.O. Box 1163

RICHMOND, VIRGINIA 23218

INSPECTION REPORT

Department of Agriculture and Consumer Services

REG FU

CFN:

Food Safety Program

NEXT IN

P. O. Box 1163

BY:

Richmond, Virginia 23218

INSPECTION REPORT

TO:

(Owner or Operator (Title) (Date)

(Firm Name) (Address)

During an inspection of on your

the following objectionable conditions were observed:

Inspection Report left with _____ by _____ Inspector # _____

Name _____ Title _____

_____ Adulterated food items listed in observations _____ were destroyed with my consent.

_____ Witnessed the collecting, marking, or sealing of samples _____

☐ Portion of Sample was left with vendor ☐ Vendor did not desire portion of sample ☐ Pictures Price Paid: $ _____

Received by

Rdnts ☐ Insts ☐ Dirty Eq ☐ Dirty Pr ☐ Misbrnd ☐ Pest Mis ☐ Fat Decl ☐ Inf Form ☐ App Lw ☐ Egg Lw ☐

Sanit ☐ Tmp Hot ☐ Tmp Cold ☐ Emp Prac ☐ Unp Food ☐ Sel Serv Sup ☐ Bldg ☐ Equip ☐ Plump ☐ Adult Fd ☐

Name Change ☐ Add Change ☐ Nw Frm ☐ Food Svc ☐ HD Inspns ☐ Frz Des ☐

Inspection Type

State ☐ Contract ☐ Agreement ☐

Basis of Inspection

Routine ☐ Compliance ☐ Complaint ☐

Product	**FDA #**	**Action Taken**	**Lbs**	**P-#**	**Lot Code**	**Problem w/Product**

Sampling Procedures

If the inspection of a food establishment indicates that food may be adulterated with filth, excessive bacteria, harmful residues, poisons, prohibited preservatives, or misbranded, the food safety specialist should collect a sample. Samples should be collected each time an inspection is made in a manufacturing plant. Legally, all samples must be collected in three parts if the vendor desires a portion of the sample; however, most routine samples are collected in one part only; the part to be analyzed. For follow-ups to violative samples or samples involving **seizure** of the product, a Commissioner's reserve portion must also be collected; therefore, these samples will be collected in three parts if the vendor desires a portion and two parts if the vendor does not desire a portion.* Prior to collecting the sample, the food safety specialist should determine if the vendor desires a portion and then collect either two or three parts as indicated. If it is impossible to divide the sample into parts, the amount available should be collected and submitted for analysis.

Service samples, which would include all food items that are no longer in normal channels of commerce, should be collected only if directed by your supervisor or if it is essential to your investigation of the complaint.

Subsamples can be taken of products when taking a

representative sample from a large lot of the same code and sampling several containers or sampling from a production line;** however, subsamples of different products should not be taken. Portions of samples should be taken randomly from different parts of the lot, and if samples are taken from a production line allow 5 to 10 minute intervals between portions.

In all cases, the food safety specialist should strive to collect samples in amounts that are representative of the lot on hand. The amounts stated in this manual are guidelines and are not intended to replace the food safety specialist's judgement. All amounts are stated as one part of the sample (the part for analysis).

* See FOM Procedure 014

** See FOM Procedure 016

I. FILTH, ADULTERATION AND STANDARDS SAMPLES

A. Canned Goods:* In canneries and warehouses, collect 12 cans of all small sizes, but collect only six number 10 cans. On investigational samples in retail stores, and follow-up samples to consumer complaint, collect a minimum of 4 cans. All cans should have the same code and care should be taken to duplicate the code exactly on all reports.

B. Grain Products(flour, corn meal, wheat, etc.): In mills, grain storage elevators, etc., collect a minimum of 6 units, but no more than 12 units. On investigational samples of cereal products in retail stores, collect a minimum of 4 units for analysis.

C. Bakery Products: Collect at least 4 units of each product sampled, but no less than 1 pound of each product.

D. Meat Products (fresh meats, sausage, fish, poultry): Collect a minimum of 2 one pound packages or 2 units.**

E. Soft Drinks: For proper sample sizes of soft drinks, refer to Field Operations Manual Procedure 003.

F. Frozen Foods: Collect a minimum of 4 packages and a maximum of 12 packages.

G. Dairy and Similar Products: Collect at least 3 packages or 3 pounds for analysis.

H. Shelled Nuts or Candy: Take a minimum of 3 pounds of each product sampled.

I. Fruits and Vegetables: Take at least 2 pounds of each product sampled.

J. Dried Fruits, Breakfast Cereals, Nonfat Dry Milk, ETC.: Collect a minimum of 3 packages.

* When sampling canned tomatoes, the follow-up sample should be double the size of the initial sample.

* * See FOM Procedure 007

II. RESIDUE SAMPLES

A Residue Sampling Program sheet will be issued to each food safety specialist on a quarterly basis (4 times per fiscal year). The sheet will indicate the products to be collected during the specified quarter, the sample size, the analysis to be performed, the number of samples of each product to be collected and where the samples should be sent. As the samples are collected, (periodically during the quarter) they should be checked off on the Residue Sampling Program sheet. When the residue sampling has been completed for the specified quarter, **the food safety specialist should sign the sheet** and submit it to the office.

Initial samples for harmful residue analysis are normally taken in one part while follow-up samples should be taken in three parts, if the vendor desires a portion. For follow-up samples, double the amounts listed on the quarterly Residue Sampling Program sheet.

III. BACTERIOLOGICAL SAMPLING

These samples should be collected in three parts if the manufacturer or vendor desires a portion.

A. Canned Foods: 4 cans except number 10 cans collect 2 number 10 cans from each lot.

B. Liquid Foods: One 16 ounce container from each lot. All liquids should be agitated before sampling.

C. Meat Products Salads, Slaw and Vegetables: 1 pound

D. Water: **Well or Spring water** tested for presence of coliform should be collected in containers furnish by the Division of Consolidated Labs. There is a supply of these in the Richmond office. These samples must be received by the lab within 48 hours of collecting. The time must be indicated on the Sample Collection report.

Finished product water should be collected in original container at least 8 oz. **Finished product water is analyzed in the micro lab and well or spring water is analyzed in the milk and water lab.**

E. Frozen Eggs: These have to be sampled with an electric drill. At least 8 ounces of shavings should be taken from each 30 pound can sampled.

The following steps should be taken when collecting bacteriological samples:

1. If possible, collect samples in original packages.

2. If it is necessary to sample from original packages, then be ready to sample immediately when the package is opened.
3. Do not contaminate tops of sterile containers.(Whirl pack bags and specimen cups are what we are currently using for sterile containers. Special containers are provided for water samples)
4. Equipment used in collecting samples must be sterile. Sterile scoops and spoons are available for collecting samples.
5. Never use defective sterile containers or utensils when sampling.
6. Refrigerated samples must be held below 40°F and frozen samples must be frozen until delivered to the bacteriological laboratory. When shipping refrigerated or frozen samples, use mailing coolers provided by the office only, as these coolers are designed to maintain proper temperatures. Cheaper or thinner coolers will not maintain proper holding temperatures, thus contributing to decomposition of samples.
7. Food products which are not perishable and normally held at room temperature require no refrigeration.
8. It is important that adequate refrigerants be placed in the shipping container for delivery of the sample to the laboratory. When possible, dry ice or ICE-PAK's should be used for shipping frozen and refrigerated samples. "Wet" ice should be used only as a last resort.
9. Period of time between taking refrigerated samples and delivery to the laboratory should be held to a minimum. (24 hours is the maximum time interval. **Avoid_shipping samples requiring refrigeration that will arrive in Richmond on the weekend**. If they do arrive on the weekend the samples must depend on their own refrigerant to hold temperature until

Monday. Usually the refrigerant doesn't last and the sample is lost.)

10. It is important that all samples be securely packed.

11. When collecting solid samples collect the sample from edge, center, and side of the original containers. Be sure a composite representative amount of the product is collected.

12. When collecting a product for bacteriological and filth analysis, one portion will have to be collected for bacteriological analysis, and a separate portion for filth.

IV. SAMPLES FOR MISBRANDING

Only one container is required for labeling samples: except that follow-up samples should be taken in 2 parts, if the vendor desires a portion. Labeling samples are mailed to your regional manager.

V. SURVEY SAMPLES

These are taken in one part only, unless larger amounts or units are specified in the survey instructions.

VI. AFLATOXIN AND OTHER MYCOTOXINS

These are usually taken as survey samples, but if moldy peanuts, grain or other field crops are encountered in commerce, the sample should be taken in three parts (if the vendor desires a portion) and **should consist of at least 4 pounds for analysis**.

VII. PESTICIDES

If during inspections, unidentified powders or liquids are found being used in a careless manner near food products, a sample should be taken to identify the substance. Two teaspoons or equivalent is sufficient and only one part need be collected. Samples of exposed food products may also be collected to check for possible contamination. **If a firm seems to be carelessly spraying pesticides and you sample product to check for possible contamination**, it would be very helpful if the brand name and/or the EPA number could be obtained from the label. This will help the lab in running the analysis and help us in determining if the Pesticide is approved for what they are using it for.

Identification and Preparation of Samples

Identify the sample by writing with a waterproof marker the collection report number, date collected, and the food safety specialist's initials. When subsamples are taken, all three portions of each subsample will be identified with the same letter of the alphabet to keep the subsamples separated.* Avoid writing over or obscuring any of the pertinent wording on a labeled product. Apply the official seal identified with the same

collection report number, date, and food safety specialist's initial's over the package opening. If a package has more than one possible opening, all openings must be sealed. The law requires that the sealing of samples must be done in the presence of a witness, preferably the owner, manager, or employee-in-charge of the operation. Be sure the witness signs the Inspection Report and initials the “Witnessed the collection, marking, or sealing of samples” section. Every sample collected, except hermetically sealed cans, requires the use of a seal.

* See FOM Procedure 016

Inspector’s Statement

The Inspector’s Statement is now in the bottom section of the Inspection Report. The owner, manager, or employee-in-charge must initial that sample(s)#_____ was/were collected and officially sealed and identified. If there is a charge for the sample, the inspector must receive a receipt from the firm which can be claimed on your expense voucher. An Inspection Report must be filled out every time a sample is collected. This will document that the store personnel witnessed that the sample was sealed and identified as well as document the visit or inspection of the firm.

Preparation of Collection Reports

Prepare collection report in the following manner:

VDACS Sample No.: The sample numbering system consist of eight numeric characters. The first three characters are your FDA number and the next five characters consist of a series of numbers starting with 00001 and ascending sequentially as samples are collected.

Inspector Code: The food safety specialist's FDA number.

Collected By: Signature of the food safety specialist.

Collected: Date & Military Time: The date the sample was collected. The military time is only needed for water samples collected for bacteria (presence/absence or MPN).

Priority: Seven (7) is for routine, five (5) is for samples that need to be put at the front of the line for analysis and one (1) is for emergencies. The one priority has to be approved through the office and the office must notify the lab.

Commodity: The type of product (grain, vegetable, ground beef, etc.).

Related Samples: Collection report numbers of any samples which are directly related; such as food products from the same lot or

products prepared from the same lot of raw materials. Also, the collection report number of the original sample(s) on follow-up samples.

Catalog Numbers: The number for the test that the food safety specialist would like run on the sample. This number is available in the Division of Consolidated Laboratory Services Analytical Services Catalog. Most of the test that are use by the Food Safety Program begin with 226.

Name of Test: The name of the test as it is listed in the Analytical Services Catalog.

No. Of Units: The number of units that the food safety specialist would like used for each test.

Total No. Of Units: The total number of units submitted under that sample number.

Seal Intact (yes/no): This is to be filled out by Consolidated Laboratory's Central Receiving.

Customer Notes: This use to be the Remarks section on the

old sample collection reports. Any information which would be of assistance to the chemist or the office in evaluation of the sample. If a consumer request a reply to a complaint it should be noted in this section. Example: Sample taken due to a complaint by John Doe of Norfolk. He said that..... and would like a reply.

Identification: All pertinent information from the label should be recorded such as; name of the product, name and address of the manufacturer, ingredients, net weight, USDA or state seals, and codes. For products with up to 7 ingredients the list of ingredients is to be typed. Products with more than 7 ingredients the statement "Ingredients ... " and "Send label to the food office" should be typed in the identification section. For residue samples the list of ingredients does not have to be included in the identification of the product. If the product is not a labeled product, then it should be identified by its exact name. Ingredient statements are not necessary on labeling samples simply type "Ingredients as stated..."

Collected From a Lot of: Amount of product from which the sample was collected. Example: Collected from a lot of "24/100 lb. bags"

Consist: Close approximation of the amount collected. **Exact amount is preferred**. Example: 4/8 oz. containers taken at random from the meat display case in one part - 12/8 oz. containers taken at random from the meat display case in

three parts.

Prepared ln the Following Manner: State exactly how the sample was prepared.
Example 1: Sample officially sealed and identified, "12345 4/10/9O A.B.C."
Example 2: Sample was placed in a poly sample bag and officially sealed and identified "12345 4/10/90 A.B.C."
Example 3:
Sample was officially identified "12345 4/10/90 A.B.C.”

Delivered To: Exactly where the sample was delivered by the food safety specialist on the date the sample was mailed or delivered to the laboratory.
Example: U.P.S., Lynchburg 4/10/90 or Greyhound Bus Station, Lynchburg 4/10/90

Establishment Where Collected: The name and address of the establishment.

Central File Number: The CFN of the firm.

Distributor or Manufacturer: Name and address of the manufacturer, packer, or distributor of the product.

Shipper and Date of Shipment: Name and address of the shipper and the exact or approximate date of shipping.
Cost of Sample: Exact cost of the sample.

The food safety specialist must sign the collection report. The white copy of the collection report accompanies the sample and the office copy or yellow copy is submitted to the office.

COMMONWEALTH OF VIRGINIA

Department of Agriculture and Consumer Services

OFFICE OF FOOD SAFETY

P.O. Box 1163

RICHMOND, VIRGINIA 23218

SAMPLE COLLECTION REPORT

DCLS LAB USE ONLY

3205	Dairy Services		256	Dairy	320 7	Meat & Poultry Services		
3211	**Food Inspection**	**X**	**248**	**Food**	321 3	Wytheville/Lynchburg		258 MPI Meats
3206	Commodity Services		257	Apple Spray	321 4	Harrisonburg/Warrenton		
					321 5	Richmond/Ivor		

VDACS Sample No. | Inspector Code | Collected By

Collected: Date & Military Time | Priority | Commodity | Related Samples

M M D D Y Y 0 0 0 0

CATALOG NUMBERS	NAME OF TEST	No. of Units
-		
-		
-		
-		
-		

SEAL INTACT (Yes/No) | TOTAL NO. OF UNITS

CUSTOMER NOTES

Collected from a lot of:

Prepared in the following manner:

Delivered to: **Delivery Date:**

Establishment where collected:

Central File Number:

Distributor/Manufacturer:

Date of Shipment:

Cost of Samples:

Notice of Seizure

Seizure notices should be issued by the food safety specialist to hold a suspect food product for further investigation. Examples:

1) Seizure should be used to hold food until analysis can be made by the chemist.
2) Seizure can be used to hold food for other agencies until they have time to take action.
3) Seizure can be used to hold food that has been in a disaster until it can be salvaged or destroyed.

The original copy of the seizure should be left with person in charge of the operation. A yellow copy should be sent to the office and a copy should be kept by the food safety specialist for his/her files.

Date: Date the seizure was made.

Issued to: Person in charge of operation.

Firm: Name of establishment.

Address: Address of establishment.

Product: Name of the product seized. The code should be recorded here, if the product is in package form.

Amount: Amount in pounds.

Manufacturer: Name of the manufacturer.

Address: Address of the manufacturer.

Reason for Seizure: (Example: The corn being ground contained rodent pellets.)

Remarks: The following statement should be typed in this section if it is not preprinted: **THIS PRODUCT IS NOT TO BE MOVED, SOLD, OR DESTROYED UNTIL RELEASED BY A REPRESENTATIVE OF THE VDACS FOOD SAFETY PROGRAM**. Also, any samples taken should be typed in this section.

Receipt Acknowledged By: Persons name and title should be typed and the person should sign it.

Food Safety Specialist: The food safety specialist name should be typed and he/she should sign it.

If the product has to be released, a “Release” form will be filled out. This form is identical to the “Seizure” form and should be filled out using above information. The “Reason” section should state the reason for the release. (Example: Laboratory analysis reveals that the product complies with the Virginia Food Laws. This product is released from seizure.)

If the products seized are found to be in violation of the Virginia Food Laws they need to be destroyed or denatured. In this case an Inspection Report will be filled out stating that the products were voluntarily destroyed or denatured. A Notice of Release need not be filled out as the Inspection Report serves as a release.

The power to seize food products on our own initiative

without recourse to the courts is unusual. Few agencies have this amount of power. Therefore, you should exercise this option judiciously. Only seize product which you have good reason to believe is contrary to the law. Be able to support your reasons with logical facts. Once you have satisfied yourself that you are justified, proceed.

As a general rule of thumb you must sample any products that you seize. Exceptions would be in instances where the damage to the product is so noticeable any reasonable person would conclude the product is unfit for food or where large lots are involved and you must hold the product until you can return to supervise salvage operations such as a disaster. During your training you will be exposed to situations that will give you a feel for when to sample and when not to. If you encounter situations where you have doubts discuss your options with your immediate supervisor.

When you do sample seized products please list the sample number(s) in the remarks section of the seizure notice. Also, on the Collection Report type **PRODUCT UNDER SEIZURE** in the upper left hand corner and in the remarks section.

When filling out the Inspection Report be sure to put in data entry section that the product was seized or released and the amount.

COMMONWEALTH OF VIRGINIA

Department of Agriculture and Consumer Services

OFFICE OF FOOD SAFETY

P.O. Box 1163

RICHMOND, VIRGINIA 23218

NOTICE OF SEIZURE

Date:

Issued to _____ **Title** _____

Firm _____ **CFN** _____

Address _____ Virginia _____

Street Address *City* *ZIP*

Product _____

Amount _____ **lbs.**

Manufacturer _____

Address _____

Reason

NOT TO BE REMOVED, SOLD, OR OTHERWISE DISPOSED OF UNLESS RELEASED BY AN AUTHORIZED AGENT

Remarks

Receipt Acknowledged by:

Form Delivered By:

Inspector # _____

Name *Title*

Inspector Name

Signature

Signature

COMMONWEALTH OF VIRGINIA

Department of Agriculture and Consumer Services

OFFICE OF FOOD SAFETY

P.O. Box 1163

RICHMOND, VIRGINIA 23218

NOTICE OF RELEASE

Date:

Issued to _____ **Title** _____

Firm _____ **CFN** _____

Address _____ Virginia _____

Street Address *City* *ZIP*

Product _____

Amount _____ **lbs.**

Manufacturer _____

Address _____

Reason

ITEMS LISTED ON THIS FORM ARE RELEASED FROM SEIZURE

Remarks

Receipt Acknowledged by:

Form Delivered By:

Inspector # _____

Name *Title*

Inspector Name

Signature

Signature

Complaints

Complaints comprise a significant portion of our work and are probably our largest source of public contact. Remember that the impression your create as you handle a complaint is the impression that the citizen concerned will have of the whole Department. Conduct yourself in a manner which will reflect well upon the Office and the Department. Remember, the tax paying public can sometimes be very demanding; display tact and patience.

Effective complaint investigation requires thorough data gathering when receiving the complaint. The complaint form itself will guide you in what questions to ask the complainant. Several sections on the form should receive special attention.

The complainant section should contain the complainants full name, street address and phone number. This is important in case we need to contact the complainant again.

The product section should contain the complete product name, container size and a description of the container (i.e. plastic bottle, bag, etc.) if this helps identify the product.

The manufacturers section should contain a complete name and address. This is sometimes the only means we have to contact the manufacturer when a problem is encountered.

The code on the container or label is extremely important. If we can obtain that information then we have a chance of obtaining the exact lot which may have a problem.

The nature of the complaint section should be filled out in as much detail as is possible. Ask as many questions as you feel necessary to get a good idea of the problem. Often referral back to this section if samples need to be taken can help you in

determining the types of analysis to ask for.

The Summary of Investigation Section should be filled out accurately and in detail. Often this is the only record of what you did. If you collect samples, record that fact, if you seize product, record that fact. In short, be sure your actions are completely documented.

The data entry section needs to be filled.

VDACS - FOOD INSPECTION **RECORD OF COMPLAINT** **DATE** _____

H _____ W _____

Name of Complainant | Address | Phone Numbers

Firm Where Product was Purchased | Address

Product | Date Product Purchased

Container Type (can, package, etc.) | Size of Container | Container Code

Manufacturer's Name | Address

Nature of Complaint: ☐ filth(size, shape, color) ☐ micro ☐ organoleptic ☐ unsanitary conditions ☐ emp practices ☐ other (specify)

Illness / Symptoms (if any) ☐ nausea ☐ fever ☐ vomiting ☐ chills ☐ abdominal cramps ☐ diarrhea ☐ burning of mouth/throat/lips

☐ metallic taste in mouth ☐ other _____

Amount of time expiring before onset of symptoms _____ hours _____ minutes

Was food poisoning confirmed by Physician? ☐ Yes ☐ No If so, how confirmed? ☐ Stool Sample ☐ Other(Specify) _____

Physician's Name | Address | Phone #

Complainant desires reply ☐ Yes ☐ No Call Complainant Regarding Service Sample ☐ Yes ☐ No By Ref to

SUMMARY OF INVESTIGATION **DATE** _____

Additional Pages Attached	Yes	No	INSPECTOR #

CFN				Address Change		CL	
Samples				New Firm		Reg Fu	
		/SS					
Ins Type	St	Contract	Agr	Food Svc		Next In	
Name Change				HD Inspns		By	

FDA Computer Generated Coversheets

COMPLETION INSTRUCTIONS

1. **DATE ASSIGNED**

   If blank, enter the date the assignment was received. the format for this field is: MM/YY; month, year.

2. **PRIORITY**

   If blank, make no entry.

3. **DATE INSPECTED**

   Enter the date the establishment inspection began. The format for this field is: MM/DD/YY: month, day, year.

4. **CENTRAL FILE NUMBER**

   Enter or correct the 7 - digit, district assigned, Central File Number. If this number is unknown, leave the data field blank. (This CFN is different from the CFN that has been assigned by the Food Safety Program office)

5. **JD/TA**

   If blank, make no entry

6. **COUNTY**

   If blank, make no entry

7. **PHONE**

   Enter or correct the Area Code (in parenthesis) followed by the telephone number of the establishment inspected.

8. **ESTABLISHMENT NAME**

   Enter or correct the legal name of the establishment inspected.

9. **STREET ADDRESS**

   Enter or correct the number and street name of the establishment inspected.

10. **CITY**

Enter or correct the name of the city or county within which the establishment is located.

11. **STATE**

Enter or correct the name of the state within which the establishment is located. The 2-character alphabetic Official Postal Service abbreviations should be used.

12. **ZIP**

Enter or correct the 5 digit ZIP Code within which the establishment is located.

13. **DISTRICT**

Enter or correct 2 which is the Baltimore Health District number that we are in.

14. **RELATED FIRMS**

Enter the name of the parent firm if it is different from that of the establishment inspected. Enter any business names under which the establishment operates, or other firms in the same corporate structure. If there are no related firms, enter "NONE".

15. **ESTABLISHMENT-TYPES/ INDUSTRY-CODES ON OEI**

Enter or correct all the unique 2-digit "Industry Codes" (industry code is the first 2 characters of the 7 character "Product Code") applicable to the establishment at the time of the inspection.

16. **TOTAL ESTABLISHMENT SIZE**

Enter the gross dollar value of the annual production of all FDA regulated products made or manipulated in the establishment inspected. If necessary, estimate this amount.

17. **INTERSTATE BUSINESS RECEIVED**

If interstate business is received by the establishment inspected. circle "YES". Otherwise, circle "NO".

18. INTERSTATE BUSINESS SOLD

Enter the percent of the establishment's volume of products entering interstate commerce, directly and indirectly. This figure should be entered directly to the left of the preprinted percent symbol (%). If the establishment management will not provide this, enter the best estimate available.

19. **REFUSAL CODE**

Enter the most appropriate 1-digit Refusal Code from among the following:

∅ No Refusal

1 Refusal to Permit Entry

2 Refusal to Allow Inspection EXCEPT by Appointment or Other Condition

3 Refusal to Furnish Qualitative or Quantitative Formulae

4 Refusal to Disclose or Permit Observations of Manufacturing Procedures

5 Refusal to Permit Review of Control Records

20. **ESTABLISHMENT CHANGES**

Circle as many of the entries as are applicable to the establishment inspected. All entries circled must be consistent with the information entered elsewhere on the coversheet. For example, if the establishment's street address, as enter by the computer printer was found to be incorrect, it should have been crossed out, and the correct

address added; then, the entry "ADDRESS CHANGE" should be circled.

IF THE ESTABLISHMENT STATUS HAS NOT CHANGED, THE ENTRY "NONE" MUST BE CIRCLED

21. **PAC**

03S800 - agreement inspection

03S001 - contract inspection

22. **PROCESS (PRODUCT) CODE**

Enter or correct the first two characters of the Product Code. These two digits designate the industry inspected. Where the same firm does business in more than one industry, select the code that best represents the industry inspected. Since the date system will only accept five characters for the Process Code, the remaining three digits must be completed with a dash (-), as in the following examples:

Bakery Products 03---

Multiple Food Warehouse 47---

23. **EST TYPE**

Enter the appropriate 1-character Establishment Type Code found in the Food Product Code Manual

24. **INSPECTION BASIS**

Enter 2 if the inspection is a routine follow-up and 1 if the inspection is a compliance follow-up.

25. **PC**

Enter the 1-character Position Classifications of all (up to three) employees conducting the inspection.

STATE PERSONNEL ENTER "S"

26. **NO**

Enter the 3-digit, district assigned Employee Number for each employee conducting the inspection. Up to 3 Employee Numbers may be entered, and these must appear directly below and agree with the

27. **HD**

Enter the 1-character Home District code for each employee conducting the inspection. We are in the Baltimore District which is #2.

28. **(PAC/Process (Product) Code Hours Reporting)**

Enter the number of hours expended by each employee during the inspection. In reporting time, include time spent on travel, time spent for file review, inspectional time and time to write-up the EIR. Report all time in excess of one hour to the nearest half-hour. Use fractions, do not use decimals. Report all times less than one hour to the nearest tenth of an hour, for example 3/10 or 5/10.

29. **PRODUCT**

Enter the name of the product(s) inspected during the inspection.

30. **SAMPLES COLLECTED: SAMPLE #**

If samples are collected during the course of the inspection, enter the number of the sample (from the sample collection report).

31. **SAMPLE COLLECTED: PRODUCT**

Enter the name of the product corresponding to each sample number entered in Item 30.

32. **483 ISSUED**

Circle "YES" if an inspection report was issued and there

were objectionable conditions. Circle "NO" if an inspection report was issued and there were no objectionable conditions observed. If an inspection report was not issued circle "NO".

33. **Food safety specialist’s NAME/SIGNATURE**

Enter the name of all employees conducting the inspection. All employees must sign and enter their assigned number entered in Item 30.

Establishment Inspection Report

Establishment Inspection Reports (EIR's) should be done on every manufacturing firm. This report gives the office important information about the firm, its operations and management structure. It also helps other food safety specialists become more familiar with the firm.

To properly complete an EIR the food safety specialist must interview a responsible person at the firm, and obtain all essential information. This includes: name and address of the firm; history of the firm; corporate/ establishment officials; name and title of person interviewed; class of products or product line; sanitary conditions; raw materials; storage and handling practices; equipment and manufacturing processes. Labels, coding information, recipes, and flow diagrams should be included. The information should be compiled in narrative form, and submitted to the Regional Manager. This will be time consuming, but time well spent. EIR's should be updated as necessary.

Establishment Report

Business: Name and address

Food safety specialist: Food safety specialist's name

Date: The date the report is made

History of Business: Brief history of the firm.

Person Interviewed: Name and title

Corp./Establishment Officials: Name, title, and addresses of the officials.

Class of Products: Types of product, sizes, packaging materials, and labels manufactured/ distributed by the firm. Areas of distribution; direct distribution or through a broker; mode of transportation.

Sanitary Conditions:

1) Building and Surroundings: Where the firm is located and the building structure and size. The material of the floors, walls and ceilings in the production and storage areas. Any other information on the physical features, including a floor plan.
2) Toilet and Washing Facilities: Where the restrooms are located and what is available; such as toilets, hand sinks with proper cleaning and drying material, showers, lockers, doors that are self closing. Any other information about restrooms.
3) Facilities for Cleaning: Who does the cleaning, when it is done, where it is done, and how it is done. What types of detergents, sanitizers and controls are used? Equipment sinks: how many and where are they located? What equipment must be "cleaned in place"? Disposal of solid and liquid waste.
4) Employees: General hygiene, clothing, jewelry, hair

restraints, etc.

5) Rodent and Insect Infestation and Control: Who does the pest control, what do they use, how do they use it, and how often. Does the firm maintain records of pest control?

6) Special Comments: Coding information; any other comments or related information.

Raw Materials: What products do they receive, how often, the supplier, and the mode of transportation? Is sampling of raw materials being done? How often? What analysis? Where is it run?

Storage and Handling of Raw Materials: How raw materials are stored and handled in the plant. Any special preparation of raw materials prior to use. How raw materials are transported inside the firm.

Equipment and Manufacturing Process: The type of equipment used. An explanation of the manufacturing process, including flow chart, product formulations, product controls and testing (pH, water activity, microbiological, taste, visual, etc.).

Food safety specialist's name

** A floor plan of the firm, flow chart and product labels should be included. **

Office Memoranda

An "Office Memorandum" form can be used to provide general information on a firm, for reporting telephone calls made using your telephone credit card, and for other miscellaneous purposes. It may be used to provide additional information or to clarify the inspection report of a firm. It may also be used to provide information for Consolidated Laboratory personnel when service samples are collected. In addition, this form can be used to provide information not related to a specific firm.

Memos directly related to visiting a firm must be done on the Inspection Report.

Travel Expense Reimbursement Voucher

The Travel Expense Reimbursement Voucher or "expense account" is a form used to itemize each food safety specialist's travel and work related expenditures. The form should be completed by each food safety specialist as often as needed. (Those food safety specialists that are driving personal cars might need to submit expense accounts more often than other food safety specialists.) The food safety specialist should make sure that the green copy is always the original. The yellow and orange copies, along with the green original, should be submitted to the Regional Manager, and the food safety specialist should keep the pink copy for his/her records.

For further instructions on completing the "expense account " see your Policies and Procedures Number 4.2, Travel.

Use Of The Camera

The camera is one of the most useful and important pieces of equipment that the food safety specialist has. Coupled with the macro lens, the camera, used by a competent photographer, can tell the complete story of the conditions in an establishment. The quality, sequence, and composition of photographs can make or break a case.

It has been said that one picture is worth a thousand words. It can likewise be said that a poor picture can be worse than no picture at all. It profits an food safety specialist to become as familiar with his/her camera as possible. A food safety specialist should know how to manipulate all the controls of his camera and flash unit. He/she should have some feeling for exposure, shutter speed, and lens opening. He/she should have some feeling for the limitations of his/her camera, what it can and cannot do. Once a food safety specialist learns these things he/she should begin to develop an eye for picture composition and sequencing shots. Remember, not only are you depicting insanitary conditions but you are telling a story as well. You want the story to lead the viewer to the conclusion that the conditions you have encountered are serious, they violate the law, and they can or do contaminate the product(s). You want the conditions you depict to hold the viewers attention. For example, suppose you found grain beetles in the flour dusting hopper of a roll machine. A simple picture of the insects would suffice. However, think of how much better two shots would be. One photo could show the roll conveyor in relationship to the other machines in the bakery with the flour dusting hopper on top of the machine and rolls traveling along the conveyor. The second shot would be a close-up showing the insects in the dusting flour. The conclusion reached by the average viewer would be that the insects in the

dusting flour could very easily and most probably do fall onto the rolls. This is but one example of the importance of photograph composition and proper sequencing. There are many others. As you gain experience in photography you will be able to recognize these opportunities with greater ease. The important thing is to remember that each inspection constitutes a photographic story. What you need to do is think about the best way to tell that story and proceed from there.

There are a few items in the simple mechanics of taking photographs that need to be mentioned.

First, all photographs should be related to objectionable conditions of your inspection report. This does not mean each photo is a different objectionable conditions. You may take several pictures of the same condition for clarity or emphasis, or you may take an area photo before zeroing in on a condition that was found in the area. What we wish to avoid is having a photo of an objectionable condition and then not being able to find the condition on the inspection report.

Second, mount your photographs according to FOM Procedure 017. Be sure that each mounting page has
the date, name and address of the firm, food safety specialist’s initials, and description of each photo.

Third, try to have the ID card in each picture. The ID card is a small approximately 3"x 5" card with the name and address of the firm, the date and the food safety specialist’s initials printed on it. The purpose of this card is to identify each photo as to location, date, and photographer. Identification is useful in court actions when giving testimony about photos. We realize that you may not be able to get the ID card into all photos. When you zero in on a small area with the macro, the ID card may be too large to include. Don't worry about it. There are exceptions

to everything. If the majority of your photos are well-identified you should have no trouble getting those exceptions introduced. What you should do is remember the ID is important and employ it wherever possible. Be sure to mount your ID card and send it with your photos. When using the ID card, try not to contaminate food contact surfaces with it. In other words, don't pick up the card from a dirty floor and set it on the bandsaw. Use another ID card if necessary.

Fourth, deliver your photos to a reputable commercial developer and insist that the developer return those photos to you personally. We have had the experience of someone other than the food safety specialist appearing at the developer and after giving the food safety specialist's name, spirited away the photos. Be aware that people are capable of practically anything and act accordingly.

A final word about the camera and accessories. We are currently issuing a 35 mm Single Lens Reflex Camera. The single lens reflex means you view through the same lens that you use to take photograph. This is the best photographic system available. The camera is further equipped with an automatic flash unit and most have macro lenses. These cameras are relatively simple to operate and are capable of excellent photographs. What they do demand is that the operators thoroughly familiarize themselves with the controls of the unit and learn the procedures involved in making the camera do what you want.

Use Of The Blacklight

Some objectionable conditions are not easily seen with the naked eye, and may go undetected. The blacklight is a useful tool in identifying such conditions. However, the blacklight is not infallible. Much depends on the acquired skill and interpretations by the user. Many contaminants appear almost the same color under the blacklight. The food safety specialist must be able to differentiate between colors.

The following is a partial list of conditions which may be detected with the blacklight:

1) Eggs that look and smell normal can still be infested with pseudomonas organisms. Clusters of pseudomonas organisms fluoresce a brilliant green and can be instantly detected and discarded.
2) Dried water lines can be detected on labels and containers of foodstuff which have been immersed in water during floods.
3) Yellowish to blue-white on milkstone (dried milk residue) laden equipment.
4) Bruises and rot spots on citrus fruits fluoresce a brilliant violet that stands out against a darker background of the healthy skin.
5) In the case of seafood, fresh shrimp fluoresce a purple-blue which changes to white as spoilage develops.
6) Separation of shell from shrimp and crab meat is easy and far more accurate with a blacklight. Shell particles fluoresce blue-white under the lights, enabling removal of additional amounts of exoskeleton, as well as endoskeleton, not normally visible.
7) Urine stains show up immediately, fluorescing blue to yellowish white.
8) Rodent urine stains on cloth bags and similar containers show

up a blue-white color. It may vary depending on the color of the cloth.

9) Dried urine fluoresces bluish to yellow-white; fresh urine appears bluish.
10) Pure cream fluoresces bright yellow. Artificial cream appears white in ordinary light and fluoresces bluish.
11) Lard and refined pig fat fluoresce blue or violet.
12) Grease in cracks and crevices shows up as shades of blue or violet.
13) Grease films on cooking utensils fluoresce a greyish color.
14) Rodent hairs fluoresce a bluish white.
15) Mercury treated wheat fluoresces a bright orange.
16) Walnuts, hazelnuts and almonds fluoresce purple to lilac when fresh, changing to yellow or brown with age.
17) Fresh dried beans fluoresce a bright green. Old ones do not react.
18) Edible mushrooms fluoresce a yellow or grey; poisonous ones, brown.
19) Pepper goes from a black fluoresce to a deep brown with age.
20) A gray hue reaction on washbasins indicates grease.

Inspector Planning

Like everything else in the Food Safety Program, planning and scheduling of the food safety specialist's work is more complicated than one would suspect. Basically, our primary duty is to inspect the food establishments in our territories on a routine basis as follows:

1) Food processing plants that manufacture nonhazardous foods - every 6 months.
2) Food processing plants that manufacture hazardous foods - every 6 months.
3) Fish processors - every 6 months.
4) Food storage warehouses
    a. Multiple foods and produce - every 12 months.
    b. Shelf stable single commodity (beer, soft drinks, snack foods, etc.) - every 24 months.
5) Food banks and salvage - every 6 months.
6) Supermarkets and groceries
    a. Groceries without food preparation - every 12 months.
    b. Groceries with food preparation - every 8 months.
    c. Groceries, including convenience stores with food service - every 4 months.

Of course, this basic plan will vary because some establishments that are habitually violative will require more attention.

Other factors that must be worked into overall planning are inspections involving establishments under mutual obligation to our Office and the FDA , working with trainees, seasonal work, disaster, consumer complaints, survey samples, inspection of new establishments, vacations and military leave.

Taking these various factors in order, let us examine each more closely.

1) Inspections involving establishments that are under mutual obligation to our Office and the FDA are scheduled on a bimonthly basis during workplanning sessions with the FDA office in Richmond. The inspections are scheduled approximately one month in advance and computer generated cover sheets are issued to inspectors covering all mutual obligation firms to be inspected for the next two months. Joint inspections (inspections to be conducted by both FDA and our Office) are also scheduled during the monthly planning sessions and the agency responsible for taking the lead on the inspection is determined at this time.
2) Working with trainees in the past has called for inspecting a wide variety of establishments in order to give the trainee experience and exposure. This policy should still be followed. If you have FDA firms you would like to have the trainee see but they are not on your workplan for the time you have the trainee call the office prior to the trainee's visit and we will have the firm(s) scheduled.
3) In some territories, seasonal work requires a great amount of the food safety specialist’s time, and it takes good organization to give the seasonal operators all of the attention they need. Some categories need more attention than others due to the nature of the raw product and the processes involved; therefore, we spend more time inspecting tomato and fish canneries than we do inspecting apple canneries. If an industry has a very short season, such as peach canneries, we should still try to inspect them at least twice during the season. Other seasonal operators would include certain seafood processors, honey processors, sweet potato and other fresh vegetable canneries, sorghum molasses manufacturers, cider mills, maple syrup processors, peanut drying operations, and

of course, the seasonal field crops that need to be sampled for harmful residues.

4) Disasters should be given precedent over routine work. In some instances, it is necessary to spend a week or more working a disaster but this is unavoidable and should be considered as an important part of our work.

5) Consumer complaints should be followed up as quickly as possible (within 10 working days for a Class II complaint and within 2 days for a Class I complaint) by taking a sample of the product involved and making an inspection of the responsible establishment if the complaint warrants such action.

6) Survey samples are requested by the Office and should also be worked into your schedule as soon as possible.

7) Samples should be taken every week; so it is wise to plan on routinely taking samples during inspections, especially when violative conditions are in evidence. This type of sample is much more meaningful than survey type samples taken for routine checks. Samples for harmful residues should also be worked into the routine schedule.

8) We should always be on the lookout for new establishments in our territories. When you see an unfamiliar name on a local product or a truck delivering from an unfamiliar firm, be sure to write down the name and address and make an inspection when you can conveniently work it into your plans.

9) Vacations and military leaves must also be worked into your overall planning. Certainly, if you have a season which is especially busy, you should take your vacation during a more slack time, and it would not be wise to place vacation and military leave end to end. Advance notice to the Regional Manager of vacation plans or military leave is necessary.

The scheduling of inspections, and for the most part, the way you work your territory, is left up to the individual food safety specialist. There is probably no one way of accomplishing this to everyone's satisfaction, because even short range plans sometimes have to be reshuffled every few days. Never-the-less, there are several simple systems being used by the food safety specialist that help to keep your work organized.

1) The first of these is an index card system. Cards are made up for each of your processing plants, warehouses, and supermarkets, and these are filed in a card file behind monthly guide tabs. After an inspection has been made, the date of the inspection is posted on the index card, and the index card is filed behind the monthly tab when reinspection is due. At the beginning of the month, the food safety specialist pulls all of the cards earmarked for that month and arranges his/her itinerary with emphasis on grouping out-of-town inspections. When a food safety specialist is unable to complete all the inspections he has scheduled for a given month, he/she should carry these over into the following month and give them preference until completed.

2) Another system is maintaining an active file of folders that are due for inspection. This is accomplished by periodic review of your alphabetic files to pull folders. This should be done at least once a month to help hold down the size of the active file. The folders of firms that require a follow-up inspection are also kept in the active file along with folders for follow-up samples, consumer complaints and requests for inspections of new firms. The entire active file is reviewed each week before the itinerary is made out and folders from inspected firms that do not require follow-ups are filed daily in the alphabetical file. Some food safety specialist mark the

dates of all inspections on the face of the folder to facilitate review. We also suggest that all food safety specialist use their calendar books when making appointments and listing dates for field hearings, court cases, etc.

3) Our data processing capabilities, both in conjunction with the Date Processing Unit (DPU) of FDA and our own Automated Data Processing (ADP) system, can be a very useful planning tool for food safety specialist. Using these systems a food safety specialist can track all his/her firms and schedule them for proper follow-up. Consequently the food safety specialist will receive monthly printouts of the firms that need inspection that month. Using these printouts the food safety specialist can schedule his/her work effectively and efficiently. The ADP system also provides us with the necessary summaries for the annual report. There are many other things that go into planning such as:

    1) Utilizing your time to the best advantage.
    2) Keeping adequate supplies in your car at all times.
    3) Keeping your camera, blacklight, typewriter and/or computer, printer, flashlight, caustic kit and automobile in good repair. A small thing like carrying spare flashlight bulbs and batteries in your car can save hours of time when there are no stores nearby.

The Training Program

Our training program is built around a four to six month on-the-job training period. During this time, the new employee works with various food safety specialists and managers throughout the state on a weekly basis. Monthly training schedules are set up, indicating the weeks to be worked and the food safety specialists to be worked with, and are supplied to all parties involved in advance so that all necessary arrangements (meeting time and place, hotel accommodations, etc.) can be made.

The first stage of the training period is spent learning, the paperwork, the policies, and the retail portion of the work. The new employee will spend approximately one or two days in the Richmond office familiarizing himself with the various laws, rules and regulations involved in Food Safety Program, Department and Section Policies and Procedures, various forms of paperwork. The first week the new employee will begin working with food safety specialists and **observing** their day-to-day activities in retail food establishments. During this time, the food safety specialists will be explaining the various operations, the conditions observed and how these conditions relate to the Virginia Food Laws. As the new employee becomes familiar with these activities, she/he well begin to handle portions of the inspection and paperwork on her/his own under supervision of the food safety specialist. At this time the new employee begins to move into the second stage of her/his trainee period.

During the second stage of training, the new employee will be working along side and comparing notes with the food safety specialist concerning the observed objectionable conditions. The new employee should also be composing the majority of the paperwork at this stage with some assistance from the food safety specialist. This second stage should be a time for the "pieces of the puzzle"

to begin really falling into place as far as inspection, paperwork and how conditions relate to the Virginia Food Laws.

Some time between the second and third stage the new employee will begin to inspect food manufacturing firms and food warehouses. The food safety specialist should be very specific as to the regulations that are enforced in these types of establishments. If possible, try to do only the manufacturing and food warehouses so that the new employee does not try to enforce the retail regulations in these establishments.

During the final stage of training, the new employee will be handling the inspection of all the different types of establishments and discussing with management on her/his own with little or no assistance from the food safety specialist. The food safety specialist however, will be observing the actions, techniques and knowledge developed by the new employee in order to determine when she/he is ready to be released from training and able to assume her/his own territory.

At this point in time, the newly trained food safety specialist will, by no means be a "polished professional" but should be able to adequately carry out the duties of a food safety specialist. The fine points of the job can be learned only by gaining experience while working alone and the experience can only come with time and patience.

A copy of the New Employee Evaluation form and instructions are included on the following pages.

TRAINER

The food safety specialist should select challenging firms in the type of establishments assigned for the training week (retail, manufacturing plants or both). The new employee will have an evaluation summary of previous training that the food safety specialist will review at the beginning of the week. After reviewing these summaries he/she might want to adjust the work schedule to cover certain areas that have not been covered or noted as needing work.

The food safety specialist should review the observations with the new employee what regulation and section is violated and the law and the section(s). The food safety specialist should also go over the different sections of the Field Operations Manual (FOM) with the new employee.

At the end of the week the food safety specialist must go over the week's progress to point out areas that were strong and areas that need improvement. An **Evaluation Form** will be filled out during this discussion for the new employee to keep in their Evaluation Notebook. In the summary area indicate one or two things that following food safety specialist need to work on with the new employee. The same evaluation form will be sent to the office except that the narrative summary part needs to be in more detail.

New Employee

The new employee should contact the food safety specialist at the end of the week before working with them (before the weekend). The new employee should give the food safety specialist their Evaluation Notebook the first day so that he/she can make adjustments to meet your training needs.

The new employee should ask for additional copies of paperwork for their notebook when the observations are unusual, the type of establishment is different, different samples are collected, etc. These will help you while you are learning. Also, you can mark on them the sections of the laws and regulations corresponding to the observation.

EVALUATION FORM

TRAINER:

NEW EMPLOYEE:

DATES:

FIRMS VISITED:

EQUIPMENT USED:

Computer and printer	☐	Sanitizer test strips	☐	Test kit for cl. residue in wells	☐
Camera	☐	Egg Light	☐	Therm./calibrating	☐
Sieve set	☐	Black light	☐		
Caustic kit	☐	Other (specify)	☐		

FORMS USED:

Inspection Report	☐	FDA 481	☐	Other (specify)	☐
Sample Collection	☐	FDA 2966(✓ sheet)	☐		
Seizure/Release	☐	NLEA (✓ sheet)	☐		
*Expense Account	☐	Picture Mounting	☐		
*Milage Report	☐	Complaint	☐		
*Leave Form	☐	Service Sample	☐		

*** must be reviewed by trainer**

SAMPLE (INDICATED THE NUMBER COLLECTED)

☐ ☐

Bacteriological		water (p/a)	
Filth		water (mpn)	
Standards		water(metals/trace organics	
Residue (sch. I)		water(bacteria/bottled water)	
Residue(sch. II)		misbranding	
Residue(sch. III)		aseptic	
In Line		other (specify)	

Did the new employee prepare & pack the samples for shipping?	
Which courier did you use to ship the samples?	

LAWS REVIEWED:

Food Law		Egg Law		Apple Laws		Vinegar Law	

REGULATIONS REVIEWED AND SECTIONS:

Retail	
Infant formula	
Ground Beef	
Sausage	
Carbonated & Still Water Bottling Plants & Bev.	
Human Consumption	

MANUALS AND REFERENCE MATERIALS USED:

Inspectors manual		FDA investigation manual	
Apple manual		Monthly work plans	
FDA Product Code Book		Monthly OAI sheet	
Analytical Catalog		Pesticide sampling sheet	

FIELD OPERATIONS MANUAL PROCEDURES (FOM): LIST SECTIONED COVERED

INSTRUCTOR'S NARRATIVE EVALUATION OF TRAINEE:

Labeling Food Products

During each inspection of a food establishment where food products are labeled and sold in package form, the food safety specialist should determine the exact ingredients being used in the finished product.

Each label should be carefully reviewed to determine if the product is misbranded. A product shall be deemed misbranded (§3.1-396 of the Virginia Food Laws):

a) If its labeling is false or misleading in any particular.

b) If the product is offered for sale under the name of another food.

c) If it is an imitation of another food, unless its label bears, in type of uniform size and prominence the word "imitation" and immediately thereafter, the name of the food imitated.

d) If its container is so made, formed, or filled as to be misleading.

e) If in package form, unless it bears a label containing
   1. The name and address of manufacturer, packer, or distributor.
   2. The name of the article.
   3. An accurate statement of the quantity of contents in terms of weight, measure or numerical count.
   4. In case it is fabricated from two or more ingredients, the common or usual name of each ingredient (except certain products which have a prescribed standard of identity).

This covers the basic concepts of food product labeling. There are many variations which you will learn about during the training program and after. Remember, the underlying purpose of our labeling program is to prevent the economic deception of the consumer. When you encounter a problem you are unsure of, call your supervisor or

submit a label for review.

Nutritional labeling is require on most retail food packages. Below are listed categories providing exemptions or special provisions for nutrition labeling. A food package loses those exemptions, which are asterisked, if a nutrition claim is made or nutrition information is provided:

1. Manufactured by small business
2. Food served in restaurant, etc. or delivered to homes ready for immediate consumption.
3. Delicatessen-type food, bakery product and confections that are sold directly to consumer from the location were they are prepared.
4. Foods that provide no significant nutrition such as instant coffee (plain, unsweetened) and most spices.
5. Infant formula and infant and junior foods to 4 years (modified label provisions for these categories).
6. Dietary supplements of vitamins and minerals (exemption does not apply to dietary supplements in conventional food form).
7. Medical foods.
8. Bulk foods shipped for further processing or packaging before retail sale.
9. Fresh produce and seafood departments in grocery stores (voluntary labeling program using placards covers these foods).
10. Sing-ingredient fish or game meat may be labeled on basis of 3 ounce cooked portion (as prepared). Custom-processed fish and game are exempt from nutritional labeling
11. Certain egg cartons (nutrition information inside lid or on insert in carton).

12. Packages labeled “This unit not labeled for retail sale” within multiunit package, and outer wrapper bears all required label statement.
13. Self-service bulk foods- nutrition labeling by placard, or on original container displayed clearly in view.
14. Donated food that is given free (not sold) to the consumer.

Preparation For Court

If it is necessary to initiate legal action against a firm, the food safety specialist must be a well prepared witness. Prior to the trial date, he/she should be sure that his/her files are up to date and in chronological order according to dates of inspection, etc. The food safety specialist should review his/her files and notes and become very familiar with the facts in the case. The food safety specialist's file and other pertinent information should be available at the trail.

When testifying, the food safety specialist should always direct his/her testimony to the judge or jurors in case of a jury trial. It is important to remember that the judge or the jury will make the final decision.

The food safety specialist should give clear, distinct, concise, and positive answers on the witness stand. You should never be evasive when answering questions. You should answer the specific question asked by the court and no more. If you do not understand a question asked by the court, then you should ask for the question to be repeated.

The following listed items are what one Virginia circuit court judge says are important in presenting a case:

1. Tell the truth.
2. Have confidence in your case.
3. Give positive answers.
4. Witness must be informed and prepared.
5. Witness must listen to the questions.
6. If you do not know the answer, say "I do not know"
7. Never get angry on the stand.
8. Must be able to prove there has been a violation through facts.
9. Impression made on the witness stand is very important.
10. Be neatly dressed.

11. Be courteous.

Disaster Procedures

The food safety specialist must be alert and on the lookout for disasters in his/her assigned territory and check all reports of flooding, fire, wrecks, power failure and explosions that could involve food products. News media will probably be your best source of information, but your contacts with local health departments, fire departments, police departments, and emergency services, can also be helpful.

When the food safety specialist learns of a disaster involving food products, he/she should get to the location as soon as possible. The entire salvage and/or destruction should be under the supervision of the food safety specialist if at all possible.

It is especially important that the food safety specialist arrive on the scene before any foodstuffs can be moved or relocated. The food safety specialist should contact the owner or custodian of the foodstuff and make a formal seizure of them unless the foods can be sanitized, denatured and/or destroyed immediately. The seizure should be made out according to the best estimate available as to the amount of foodstuff involved.

It should be determined as to whether any foodstuffs have been removed from the stricken area, and if so all available information should be noted for forwarding to the officials in charge of the area to which the foods were shipped. The probable arrival date should be included in this information.

The office should be contacted if it appears that additional food safety specialists will be needed to handle the situation.

The police authority having jurisdiction should be contacted for possible guard duty if it is considered necessary.

The proper disposal of unsalvageable material, especially perishables, should proceed without delay. The matter should be handled on consent of the owner. Bacteriological examination of

foodstuffs will not be necessary to prove their contamination when the actual physical facts are sufficient upon which to base judgement.

It is best to secure the immediate destruction of all products that cannot be safely reconditioned or salvaged because as time passes, owners of damaged stock find excuses to delay. Questionable attempts at reconditioning are made, new plans for salvage are devised and worst of all unscrupulous salvage merchants and insurance adjustors make contact and attempt to circumvent the law.

Products to be destroyed should be taken to the nearest public dump. (If a public dump is not convenient, private arrangements may have to be made.) The food safety specialist should contact the person in charge of the dump and ask him/her to crush the foodstuffs so that they cannot be dug up by scavengers. If the foods cannot be destroyed by crushing, they may be deeply buried. Burning is very risky and is not recommended. Never use gasoline to start a fire.

Many products can be released for unsupervised salvage operations if properly denatured in such a manner that they cannot be used for human food. Tankage, fish oil, charcoal or mixture of other damaged foodstuffs (such as molasses into cereal) should be added in such amounts that there is no likelihood of use of the denatured food for human consumption.

When a product has been properly denatured, it needs no further supervision. Denaturing should be insisted upon insofar as practical in order to release personnel from supervisory work of salvaging undenatured products.

What merchandise should be destroyed? Anything that cannot be reconditioned or has no salvage value. Some products that cannot safely be cleaned for human consumption are: lettuce, cabbage, celery, coffee, tea, flour, meal and other cereals, confectionery,

nuts, etc.

Salvage and reconditioning operations should be started as soon as possible after the disaster in order to minimize economic loss. They should be performed at the place where damage occurred.

Legally, we are only concerned with human foods, but when such items as paper plates, paper cups, and food wrapping materials are found to be contaminated, we should advise management of the potential dangers involved. As for foods, let us break them down into the following categories:

1) Flood damaged foods: All food items that have been immersed in flood waters, except undamaged cans with sound double seams or the equivalent, should be either destroyed, denatured, or reprocessed in such a manner that the product is rendered free of contamination. Judgement must be exercised, however, and only products which have been protected from gross contamination should be reprocessed. For example, peanut oil which was stored in bulk tins with only a pressure type seal on the pour spout could be reprocessed. Canned goods with screw type lids and bottled soft drinks should be destroyed. It would be possible to completely reprocess some items with screw type lids at a cannery, but unless a large lot was involved, it would not be economically feasible. Those items above the water level, unless they have been splashed or unless they are items which require refrigeration, should be satisfactory.

2) Fire damaged foods: Try to ascertain the degree of heat that was involved and the length of time that this heat was sustained. Below is a list of melting points of various substances that should assist you in determining the degree of heat. If the food containers have been scorched or heavily damaged in any other way, they should be destroyed. Very often

cases of food will be packed tightly together, however, and the cases in the middle of the stack may be salvageable. If there is any question in your mind, a bacteriological sample should be taken and the product should be analyzed before it is released. In a severe fire that involves loss of electrical power, usually all frozen food, meat products, dairy products, and produce have to be destroyed. Of course, it is permissible for a rendering company to pick up meats and meat products, but unless the meats are in advance stages of decomposition, it would be a good idea to denature them in some manner.

The determination of which foods are salvageable and which are not requires the exercise of judgement on the part of the food safety specialist.

Each case is different in as much as each fire is different. When you arrive on the scene of the fire try to determine as much as you can about the nature of the fire and the extinguishment practices employed. The melting points given in this section can give you some idea as to the intensity of the heat. Another question to answer is what burned. Burning plastics, chemicals, pesticides, etc. give off noxious fumes and would make smoke damage much more significant than it would be if only ordinary combustibles such as wood, cloth and paper fueled the flames. In assessing smoke damage you would want to determine if the container of the food product would resist the passage of smoke vapors or would it permit them to contaminate the product. If you determine that the product packaging would defeat smoke penetration then your next question is can the smoke and soot be adequately removed from the container. If it can then the product may be salvageable.

Another question to answer is what was used to extinguish the fire? In most cases it is water. However, the source of the water is important. In most cities water supplied to fire hydrants comes

from the city water mains and is potable. However, in most rural fires, the water is supplied from creeks, ponds, etc. and must be considered contaminated. This would affect your judgement on food products subject to contact by the water. In instances where chemicals were used to fight the fire, then of course you should be wary of any food items the chemicals contacted.

As you can see, the evaluation of foods involved in a fire for salvage is a difficult procedure. There is no set rule of thumb to go by. Be guided by the question "has the product been contaminated?" Once you answer this question then you can work down through the questions "can the product be cleaned and salvaged", "how can the product be cleaned and salvaged' and "does the firm have the facilities to do the job". By exploring each of these questions in detail you should be able to reach a satisfactory disposition for products involved in fires.

Melting Points of Various Substances

WAX	-	150°F
PLASTICS	-	300°F
LEAD OR SOLDER	-	620°F
ALUMINUM	-	1214°F
GLASS	-	1300 - 1400°F
COPPER	-	1943°F
STEEL	-	2532°F
HARD STEEL	-	2687°F

3) Foods in explosions: Explosions generate a lot of dust and pressure. They can also demolish mechanical refrigeration equipment. Check for damaged containers, dust and other foreign matter in any open containers, and make sure that refrigeration is adequate.

4) Power Failure: When an ice storm or some other incident causes loss of power to an area, all of the food establishments with refrigerated or frozen foods should be checked. If dry ice is used on frozen foods before thaw, and if they keep sufficient dry ice on the products until power is restored, then they

should be satisfactory. Once highly perishable frozen foods such as meats, poultry, seafood, cream, filled pastries, etc. have completely thawed, they should not be refrozen for sale to consumers; these foods should either be used immediately, destroyed or denatured. Other refrigerated foods should be maintained below 45° F. Be sure to caution dealers using dry ice that C02 gas will settle and deplete the oxygen in refrigerated cases and walk-in freezers.

5) Train and truck wrecks: Check all foods for container damage which could lead to possible contamination. Very often in wrecks, you will find spilled gasoline, diesel fuel, or chemicals and contaminated water from fire fighting equipment. If there is any question in your mind about the safety of the product, try to have the products destroyed or seize the products and contact the office.

Interstate Movement of Foods

Usually, foods to be salvaged should be cleaned and sanitized on the premises under our supervision, but in some instances we will allow unsanitized foods to be moved to another location within the state to be sanitized. When this takes place, an accurate count of the goods involved should be made, the container and/or the vehicle used in shipment should be sealed, provisions should be made for an food safety specialist to witness the clean up or reprocessing operation at the destination, and you should contact the office prior to shipment.

INTERSTATE SHIPMENT OF DAMAGED FOOD PRODUCTS

On occasion we get requests from salvage firms to transport damaged food products to their salvage facilities out of state. We do allow such movement but only under controlled conditions. If you are approached with such a proposal you should contact the office and we will determine what they want to ship, how they intend to do it, where it will go and when. Usually we do not allow the shipment of obviously unsalvageable merchandise. Once we determine this information, we will contact state authorities in the state of destination and receive assurances from them that they are willing to receive the merchandise and that they will have food safety specialists present to meet the merchandise and supervise it reconditioning.

Finally, before the products are shipped, we obtain an inventory, seal the truck with numbered metal box car seals, obtain the name of the carrier, the license number of the trailer and report all this to the out of state authorities.

Operation Of State Owned Automobile

I. GENERAL OPERATION

A. Assignment of Automobile

a. The automobile is assigned to you for the purpose of performing your regular duties and special assignments in your assigned territory and other points in Virginia.

b. The use of state owned automobile for purposes other than those specified above shall be only with the consent of your immediate supervisor.

B. Maintenance and Service of Automobile

a. All automobiles shall be serviced at State Department of Transportation shops. This shall include gasoline, oil, lubrication, and washing.

b. All maintenance and repair work shall be performed at State Department of Transportation Shops. This shall include minor and major repairs.

c. In case of emergency, when it is impractical to reach a State Shop, courtesy cards, which have been supplied may be used.

C. Monthly Mileage Reports

a. All operators of State owned automobiles are required to submit a mileage report on forms furnished for this purpose to the Department. This report should be submitted to the office at the end of each month **(must be in Richmond by the 5th day of the following month)**. All bills and statements relative to purchases must be attached to the report.

b. Instructions for completing mileage reports are stated on the form. A reference copy is provided for

you.

D. Accidents

a. When an accident occurs, the driver of a State owned automobile must file a complete and comprehensive report which will be reviewed by the Safety Committee set up by the Governor of Virginia. If this Committee decides that the accident resulted from speeding, careless or reckless driving, or any other fault of the driver, then the Department will be held liable for repairs and other damages, and the driver will be subject to penalty.

b. When an accident occurs, the operator of a State vehicle shall promptly notify a State trooper and request their cooperation in investigating and making a report on the cause of the accident. This office shall be notified promptly when an accident occurs and the operator should fill out the necessary insurance forms and mail such forms to the office **immediately**.

c. Each operator of a State vehicle should thoroughly acquaint himself with instructions pertaining to the operation of such vehicles and the procedure for reporting accidents. These instructions are placed in each vehicle as well as forms for reporting accidents.

d. Safety first - it pays! Make it a point to drive carefully and observe all traffic laws.

E. Appearance of State Owned Automobile

a. It is essential that we exercise proper care to keep the automobile we operate clean and neat at all times.

b. A clean automobile reflects good judgement and adds to the confidence other people have in us. We realize that at time weather conditions make it quite impossible to keep your car clean, but there is need for realization of the importance of this matter.

General Reference On Food Related Pests

One of the major components of our work is the detection of food related pests in the establishments we inspect. Such findings are indicative of insanitary conditions and are very important in supporting charges against a violating firm.

In order to recognize and investigate food pest problems, some background information concerning life history, habits and description of the more common pests is necessary. The following pages provide such information and are to be used in conjunction with your on the job training.